

QA 18253



THE SECRETARY OF TRANSPORTATION

WASHINGTON, D.C. 20590

March 5, 1993

HC: Docket 93-1
(original for your file)
FILE

FHWA-97-2200

The Honorable Tom Harkin
United States Senate
Washington, D. C. 20510-1502

Dear Senator Harkin:

Thank you for your letter providing your views on the proposed Interstate route numbering changes in the Quad Cities area. Your comments will be added to the public docket.

The advantages and disadvantages of the proposed changes will be evaluated by the Federal Highway Administration (FHWA) on the basis of the six criteria (safety impacts, system impacts, physical condition of facilities, proposed improvements, economic impacts, and environmental impacts) which were listed in the November 17, 1992, Notice and Request for Comments published in the Federal Register. Comments and information received from the Illinois and the Iowa Departments of Transportation and the public will be carefully evaluated.

A multidisciplinary FHWA team (representing planning, engineering, environment, motor carrier operations, and safety and traffic operations) is now evaluating the proposed changes. You can be assured that we will inform the Iowa and Illinois congressional delegations, as well as the Iowa and Illinois Departments of Transportation, when a final decision is made on the proposed changes.

Thank you again for your personal interest in this matter. Your comments are helpful.

Sincerely,

Federico Peña

FHWA:HPD-1:TBroberg:tb:6-4077:2/11/93 Files HPD-WU

FHWA Control No. 930210-013

cc: HOA-2, HOA-3, HOAES, HOAKG

HCC1, HOA-SS, C, P, I, B, S-10

S-10 Control No. 930209-001

Files HEP-10

Mr. Heanue HEP-1 HPD-VS

Mr. Weeks HEP-10 HRA-05, HDA-IL (2)

HDA-IA (2)

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United States Senate

WASHINGTON, DC 205 10-1 502

February 8, 1993

Secretary Fredrico Pena
Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Dear Secretary Pena:

The Illinois Department of Transportation is applying to the U.S. Department of Transportation to renumber the interstate highways in the Quad Cities, a metropolitan area evenly divided between Iowa and Illinois. The Illinois DOT wants to change I-80 in Scott County, Iowa to I-280. Then, the present I-280 in Rock Island County, Illinois, would become I-80. This has become a very bitter issue in Iowa and Illinois. It actually became the subject of a vote on the floor of the U.S. Senate on June 13, 1991, when Illinois' effort failed 72 to 26.

I believe that Illinois' case is not meritorious: 1) the motivation of the proponents of renumbering is economic -- to transfer traffic and the resulting economic benefits to Illinois 2) legally, a decision to renumber the Interstates should be made -when both states and the Metropolitan Planning Organization (MPO) agree 3) the cost and safety arguments made by Illinois do not hold up under analysis.

Having read the local news stories and discussed the issue with many people from the area over the last several years, I believe the principal motivation of those who initiated the current effort to renumber the Interstate Highways is simply to shift vehicle traffic from Iowa to Illinois. With that shift, Illinois would add hotel and restaurant capacity and the associated increased income at Iowa's expense.

With the I-80 designation on the Iowa side of the Mississippi River, Iowa's Scott County now has 1,827 hotel rooms directly serving I-80 traffic, compared to 827 directly serving I-280 in Rock Island County, Illinois. The I-80 traffic, according to numbers developed by the Center for Survey and Marketing Research at the University of Wisconsin, produces 4,758 jobs, \$62 million in income and \$16.6 million in state and local taxes for Iowa when direct and indirect effects are considered. A good share of that income would be shifted away from Iowa if the Interstates were renumbered.

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The occupancy rate for Iowa hotel rooms directly serving I-80 was 66.7 percent in 1992. If the route designation were changed, the University of Wisconsin study indicates that the occupancy rate would drop to 42 percent. With that reduction, we can expect a number of Iowa hotels to go into bankruptcy.

The federal government should have an extremely solid reason to make a change that would cause this type of substantial dislocation. In this case, based on the physical merits, I believe that the numbering decision might have been a relatively equal question in the 1950s when the decision was initially made. But there is no real weight of data to overturn the decision and endanger the considerable private and public investments that were made based on that original decision.

As a matter of law, the case is overwhelmingly against renumbering unless both states agree. United States law, specifically 23 USC 103, provides that:

"The routes of this system, to the greatest extent possible, shall be selected by joint action of the state highway departments of each State and the adjoining States, subject to the approval of the Secretary..."

The statutory language is clearly reflected in the Federal Highway Administration's regulation, 23 CFR part 470, which discusses changes in the federal highway system and specifically considers route numbers as being covered in FHWA procedures. Section 470.115(a) states that modifications, as well as initial designations, be covered by the rules. Under Section 470.107, the requirement that the affected states need to agree is clearly set out.

Another important point is that a change in route numbers would be a "project" under the Intermodal Surface Transportation Efficiency Act (**ISTEA**). In an April 15, 1992, letter to Darrell Rensink, the Iowa DOT director, FHWA Administrator T.D. Larson said:

"Section 1.36 is similarly broad since it concerns compliance 'with respect to a project,' a term that has been defined in Section 1.2 as including any work or activity. Assigning Interstate route numbers is an activity carried out pursuant to Federal laws for the administration of Federal aid for highways and, therefore, falls under the definition of 'project'." (emphasis added)

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I believe any proper reading of the statute leads to that conclusion. **ISTEA** requires that **MPOs** adopt an initial "transportation improvements program" setting out a priority list of "**projects**" over the succeeding three years. State **DOTs** are supposed to take projects from the **MPO's** list. In this specific case, this project is not on the area's **MPO's** list. In fact, the **MPO** formally voted to confirm its long-standing position on the issue and rejected, by a vote of 22-12, the renumbering of the interstates. This was not a straight state-by-state vote.

The main formal argument made by Illinois is the concern for safety and related construction costs. The Illinois DOT says it needs to improve the I-80/I-74 "**big X**" interchange if the routes are not renumbered. But, if the routes are renumbered, an interchange problem develops in Iowa at the I-80/I-280 "**Y**" interchange which would then require considerable work by the Iowa DOT. In fact, I understand that Illinois' "**big X**" interchange will need to be redesigned in the future in any case. However, Iowa is not likely to have to redesign their "**Y**" interchange unless the renumbering occurs.

The Illinois DOT has not provided any proof that the level of accidents on its interchange is related to route numbering. The portion of the interchange with the highest accident rates appears to result from traffic travelling east on I-280 and then going south on I-74. This problem would, in fact, be exacerbated by increased traffic going east on the present I-280, the interstate segment the Illinois DOT wants to renumber. The other safety argument raised by Illinois concerns the traffic accident rates on the I-80 and I-280 Mississippi Interstate bridges. In fact, the number of accidents on a per million vehicles rate on those bridges is substantially the same.

For all of the above reasons, I believe that a renumbering of the Interstate Highways in the Quad Cities area is not appropriate.

Sincerely,



Tom Harkin
United States Senator

TH/rb

cc: Federal Highway Administration
Office of Chief Counsel

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